

Honeywell
6711 Towpath Road
P.O. Box 310
Suite 255
East Syracuse, NY 13057-0310
315 289-0092
315 289-0098 Fax

April 20, 2001

Mr. Timothy J. Larson, P.E.
Project Manager
Division of Hazardous Waste Remediation
NYSDEC
50 Wolf Road
Albany, NY 12233-7010

**RE: Onondaga Lake RI/FS
Remedial Investigation Report (RI)
Baseline Ecological Assessment Report (BERA)**

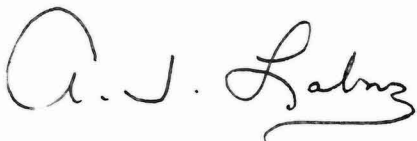
Dear Mr. Larson:

Pursuant to the schedule modification approved by the NYS Department of Law and NYSDEC regarding the Onondaga Lake RI related documents, enclosed are the final Onondaga Lake RI and BERA. I believe that we have addressed all NYSDEC comments on the draft documents submitted in May 1998. Although NYSDEC's position on certain issues related to the RI (groundwater advection, porewater diffusion and mass balance) and to the BERA (food web model) are yet unknown due to agency time constraints, we believe that both of these documents will be determined to be acceptable.

In order to respond to NYSDEC direction, the BERA uses a number of assumptions and approaches that, in Honeywell's view, are highly uncertain and conservative and are likely to overpredict ecological risks. Honeywell does not believe that the results from these approaches should be used as the basis for cleanup decisions for the Lake. In addition, Honeywell reserves the right to challenge such assumptions or approaches or their results in the context of NYSDEC's review of this BERA or in connection with its issuance of a ROD or other cleanup decision for the Lake. Nothing in this BERA should be regarded as a precedent for any other site or as waiving Honeywell's right to challenge similar assumptions and approaches at other sites.

We will be happy to discuss any issues and questions NYSDEC may have during the review of these two documents, or to supply additional information in support of our conclusions.

Sincerely,



Alfred J. Labuz
Manager
Remediation & Evaluation Services

Enclosures

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cc:	R. J. Ford	w/enclosures	(1)
	G. D. Quin	"	(1)
	Norman Spiegel, Esq. - NYSDOL, NYC	"	(1)
	Michael J. O'Toole, Jr. - NYSDEC	"	(7)
	Carol Conyers, Esq. - NYSDEC	"	(1)
	Robert Montione - NYSDOH, Albany	"	(1)
	Henrietta Hamel - NYS Health Dept.	"	(1)
	Kevin Kelly - NYSDEC-7	"	(2)
	Luis Mendez, Esq. - OCDOL	"	(1)
	Manning Gasch, Jr., Esq. - Hunton & Williams	"	(1)
	John Davis - NYSDOL	"	(1)
	Robert Nunes - USEPA, Region II, NYC	"	(2)
	Michael Spera - TAMS	"	(1)
	David Coburn - Onondaga County Dept. of Env.	"	(1)